

1 Craig A. Hansen (SBN 209622)
2 Email: craig@hansenlawfirm.net
Stephen C. Holmes (SBN 200727)
3 Email: steve@hansenlawfirm.net
Sarah Wager (SBN 209277)
4 Email: sarah@hansenlawfirm.net
Philip E. Yeager (SBN 265939)
5 Email: phil@hansenlawfirm.net
Collin D. Greene (SBN 326548)
6 Email: collin@hansenlawfirm.net
HANSEN LAW FIRM, P.C.
7 75 E. Santa Clara Street, Suite 1150
San Jose, CA 95113-1837
Telephone: (408) 715 7980
8 Facsimile: (408) 715 7001

9 Jingjing Ye (Admitted Pro Hac Vice)
10 Email: yelaw@pm.me
YE & ASSOCIATES, PLLC
11 3400 N Central Expy Suite 110-132
Richardson, TX 75080
Telephone (469) 410-5232

12 Attorneys for Defendant Temujin Labs, Inc.,
13 and Individual Defendants

14 Constantine P. Economides (pro hac vice)
(Florida Bar No. 118177)
15 Brianna Pierce (CA Bar No. 336906)
ROCHE FREEDMAN LLP
16 1 SE 3rd Avenue, Suite 1240
Miami, FL 33131
Tel: (305) 971-5943
Email: ceconomides@rochefreedman.com
bpierce@rochefreedman.com

17 Attorneys for Plaintiff Ariel Abittan

18

19 **UNITED STATES DISTRICT COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**
21 **SAN JOSE DIVISION**

22 ARIEL ABITTAN,

23 Plaintiff,

24 v.

25 LILY CHAO (a/k/a TIFFANY CHEN, a/k/a
YUTING CHEN), DAMIEN DING (a/k/a
DAMON LEUNG, a/k/a DAMIEN RAY
DONOVAN, a/k/a TAO DING), YUTING
CHEN, TEMUJIN LABS INC. (a Cayman
Islands corporation), and Does 1-100,
inclusive,

26 Defendants.

27 Case No.: 5:20-CV-09340-NC

28 **DECLARATION OF CRAIG A. HANSEN
IN SUPPORT OF STIPULATION RE
CONTINUANCE OF CASE
MANAGEMENT CONFERENCE;
[PROPOSED] ORDER**

Judge: Hon. Nathanael M. Cousins

1 I, Craig A. Hansen, hereby declare:

2 1. I am an attorney admitted to practice before this Court and an attorney at the law firm
3 of Hansen Law Firm, P.C. (“HLF”), which represents Defendant Temujin Labs Inc., a Cayman
4 Islands corporation (“Temujin Cayman”) and the Individual Defendants (collectively “Defendants”).
5 I have personal knowledge of the matters set forth in this declaration and, if called upon to do so,
6 could and would testify competently as to the matters described below.

7 2. I am currently scheduled to be in a mandatory settlement conference on another
8 matter in Santa Clara County Superior Court on September 14, 2022, the same date the Case
9 Management Conference is set for in this matter. I am also scheduled to be in trial on that same
10 matter on September 21, 2022.

11 3. HLF and counsel for Plaintiff have met and conferred and agreed: (1) to continue the
12 Case Management Conference from September 14, 2022 at 11:00 a.m. to September 28, 2022 at
13 10:00 a.m., and (2) that the joint case management conference statement would be due by September
14 21, 2022.

15 4. I do not believe that the requested time modification would have a prejudicial effect
16 on the schedule for the case. Trial has not been set in the case, and no discovery has been conducted
17 yet (the depositions of the Individual Defendants were stayed pursuant to the Court’s order on May
18 2, 2022, Dkt. No. 139).

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct.

21 Executed this 7th day of September, 2022, at San Jose, California.

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24 By: 
25 Craig A. Hansen
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